

Rebecca Cambreleng, OSB No. 133209
rebecca@employmentlaw-nw.com
Ashley A. Marton, OSB No. 171584
ashley@employmentlaw-nw.com
CAMBRELENG & MARTON LLC
3518 S. Corbett Ave.
Portland, Oregon 97239
Telephone: (503) 477-4899
Of Attorneys for Plaintiff

Meredith Holley(she/her), OSB No. 125647
Meredith@ErisResolution.com
Law Office of Meredith Holley
207 E 5th Avenue, Suite 254
Eugene, OR 97401
Phone: (458) 221-2671
Fax: (833) 352-3615
Of Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

LAURA HANSON,

Plaintiff,

v.

**STATE OF OREGON LEGISLATIVE
ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

**PLAINTIFF'S RESPONSES TO
DEFENDANT'S OBJECTIONS TO
PLAINTIFF'S STATEMENT OF
SPECIAL DAMAGES AND MOTION
TO STRIKE**

Plaintiff responds to Defendant's objections to Plaintiff's special damages and motion to strike as follows:

CONFERRAL

Defendant failed to confer regarding its motion to strike under LR7-1.

RESPONSE

The basis for Defendant's objection is unclear. Defendant's own records show Plaintiff's employment at the Oregon Employment Department ended on August 31, 2021. Pl. Trial Ex. 43 at 2 (Hanson_Defendants_000745). Plaintiff provided to Defendant extensive records of job applications after that point. Clearly, Defendant was aware Plaintiff was looking for a job as of December 2022 because it offered to rehire her.

However, Defendant's Exhibit 229 did clarify that Plaintiff was paid \$5,219 at the time of her termination, rather than the \$4,727 listed in her initial hire paperwork and in error on Plaintiff's list of special damages. This makes our estimate of Plaintiff's total wage loss \$125,282. We apologize for this error.

Plaintiff's therapist's records were provided as Plaintiff's Trial Exhibit 41. While one page of the document does not include the costs of the visits, Plaintiff or her therapist are available to testify that the cost per visit did not change. Defendant has requested updated records, and we have reached out to medical providers to find out if there are any updates.

Plaintiff asks the court to deny Defendant's motion.

Submitted this 25th Day of April, 2024.

/s Rebecca Cambreleng
Rebecca Cambreleng, OSB No. 133209
Rebecca@employmentlaw-nw.com
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3518 S. Corbett Avenue
Portland, OR 97239
Of Attorneys for Plaintiff

Meredith Holley(she/her), OSB No. 125647
Meredith@ErisResolution.com
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CERTIFICATE OF SERVICE

I certify that on April 25, 2024, I served the foregoing **PLAINTIFF'S RESPONSES TO DEFENDANT'S OBJECTIONS TO PLAINTIFF'S STATEMENT OF SPECIAL DAMAGES AND MOTION TO STRIKE** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

Meredith Holley, OSB No. 125647
Meredith@erisresolution.com
Eris Conflict Resolution
207 E 5th Avenue, Suite 254
Eugene, Oregon 97401
Of Attorneys for Plaintiff

Marc Abrams, OSB No. 890149
Marc.abrams@doj.state.or.us
Allie Boyd, OSB No. 163478
Allie.m.boyd@doj.state.or.us
Oregon Department of Justice
100 SW Market Street
Portland, Oregon 97201
Attorneys for Defendant

CAMBRELENG & MARTON LLC

By: s/ Maxwell Joyner
Max Joyner, Paralegal